

DANIEL G. BOGDEN  
United States Attorney  
KIMBERLY M. FRAYN  
Assistant United States Attorney  
501 Las Vegas Blvd. S.  
Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6546 (Telephone)  
(702) 388-5087 (Fax)  
[Kimberly.frayn@usdoj.gov](mailto:Kimberly.frayn@usdoj.gov)

Counsel for Plaintiff United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

2:16-CR-00276-APG-GWF

VS.

WYATT ALLRED,

Defendant.

## STIPULATION FOR PROTECTIVE ORDER

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,

United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney for the District of Nevada.

States Attorney, counsel for the United States, and Monique N. Kirtley, Assistant Federal Public

Defender, counsel for defendant WYATT ALLRED, that this Court issue an Order protecting

From the point of view of the patient may also apply the following principles of treatment:

1 information such as social security numbers, drivers' license numbers, dates of birth, financial  
2 account numbers or addresses, of participants, witnesses and victims in this case. Such  
3 documents shall be referred to hereinafter as "Protected Documents." The parties state as  
4 follows:

5       1. Protected Documents which will be used by the government in its case in chief  
6 include personal identifiers, including social security numbers, drivers' license numbers, dates of  
7 birth, financial account numbers and addresses, of participants, witnesses, and victims in this case.

8       2. Discovery in this case is not unusually voluminous, however, given the nature of  
9 the allegations, and the facts and circumstances surrounding the crimes with which the defendants  
10 are charged, that is, that the defendants manufactured and used counterfeit mail keys to steal mail  
11 from repository boxes and then assumed a the identity of persons other than themselves to obtain  
12 money, many of the documents in the discovery, including hundreds of pieces of recovered stolen  
13 mail, necessarily include personal identifiers. Redaction of the personal identifiers prior to  
14 discovery production will be unnecessarily burdensome on the government's resources and will  
15 necessitate a brief delay in the timeliness of discovery disclosure.

16       3. Instead, the United States agrees to provide Protected Documents without redacting  
17 the personal identifiers of participants, witnesses, and victims, so long as the Defendants agrees to  
18 this Protective Order in an effort to reduce the risk of re-victimization.

19       4. Access to Protected Documents will be restricted to persons authorized by the  
20 Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,  
21 secretaries and other persons employed by the attorneys of record and performing on behalf of  
22 defendants.

1       5. The following restrictions will be placed on defendants, defendants' attorneys and  
2 the above-designated individuals unless and until further ordered by the Court. Defendants,  
3 defendants' attorneys and the above-designated individuals shall not:

- 4           a. make copies for, or allow copies of any kind to be made by any other person of  
5 Protected Documents;  
6           b. allow any other person to read Protected Documents; and  
7           c. use Protected Documents for any other purpose other than preparing to defend  
8 against the charges in the Indictment or any further superseding indictment arising out of this case.

9       6. Defendants' attorneys shall inform any person to whom disclosure may be made  
10 pursuant to this order of the existence and terms of this Court's order.

11      7. The requested restrictions shall not restrict the use or introduction as evidence of  
12 discovery documents containing personal identifying information such as social security numbers,  
13 drivers' license numbers, dates of birth, financial account numbers and addresses during the trial  
14 of this matter.

15      8. Upon conclusion of this action, defendants' attorneys shall return to government  
16 counsel or destroy and certify to government counsel the destruction of all discovery documents

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1 containing personal identifying information such as social security numbers, drivers' license  
2 numbers, dates of birth, financial account numbers and addresses within a reasonable time, not to  
3 exceed thirty days after the last appeal is final.

4 DANIEL G. BOGDEN  
United States Attorney  
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6 /s/Kimberly M. Frayn  
KIMBERLY M. FRAYN  
7 Assistant United States Attorney  
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October 4, 2016  
DATE

9 /s/Monique N. Kirtley  
MONIQUE N. KIRTLEY  
10 Assistant Federal Public Defender  
Counsel for defendant ALLRED  
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12

October 4, 2016  
DATE

13 **ORDER**

14 IT IS SO ORDERED this 12th day of October 2016.

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16 UNITED STATES MAGISTRATE JUDGE  
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